



Era Aviation, Inc.

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Anchorage, Alaska
99502

DEPT. OF TRANSPORTATION
DOCKET SECTION

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29 September, 1998

U.S. DOT Dockets
Docket No. FAA-98-4390 -41
400 Seventh Street, SW, RM. Plaza 401
Washington, DC 20590

OFFICE OF THE
CHIEF COUNSEL

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To Whom It May Concern,

This comment is in response to the proposed elimination of SFAR 29-4.

Era Aviation, Inc. (Era) has SFAR-29 listed as a capability in our FAA approved Operations Manual. Era does not want to lose this capability.

Era used SFAR 29 to prove IFR capabilities in a then non IFR certified helicopter. The SFAR allowed us to prove that the particular IFR operations were safe. These IFR operations were necessary to develop natural resources in areas that could only be serviced by helicopter transport. Era continues to provide IFR helicopter services in these areas.

SFAR 29-4 is the vehicle that will implement new concepts in IFR helicopter transport. There were concepts not thought of in the past when some models of helicopters were certified. An accidental loophole in certification could happen today with helicopters already in service or newly developed helicopters.

The services Era, along with other helicopter operators, provided our customers and in the end all of us citizens using SFAR 29 were important then, and could be in the future.

Thank you for the opportunity to comment.

Sincerely,

Warren E. Lowry
Manager
Special Projects